

Pamela M. Egan, WSBA No. 54736  
POTOMAC LAW GROUP PLLC  
1905 7<sup>th</sup> Ave. W.  
Seattle, WA 98119  
Telephone: (415) 297-0132  
Email: [pegan@potomaclaw.com](mailto:pegan@potomaclaw.com)  
*Attorneys for Mark D. Waldron, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:  
  
GIGA WATT, Inc., a Washington  
corporation,  
  
Debtor.

Case No. 18-03197 FPC 11  
  
The Honorable Frederick P. Corbit  
  
Chapter 7

**TRUSTEE'S MOTION TO FIND  
THE PERKINS GROUP IN  
CONTEMPT AND TO IMPOSE  
SANCTIONS; NOTICE  
THEREON**

Mark D. Waldron, the duly appointed Chapter 7 Trustee ("Trustee") in the above-captioned case, hereby moves for an Order imposing civil contempt sanctions against Perkins Coie LLP, Lowell Ness (collectively, "Perkins"), Byrnes Keller Cromwell LLP, Ralph E. Cromwell, Jr., and Joffrey McWilliam (together with Perkins, "Perkins Group"). This Motion is supported by the Memorandum of

**TRUSTEE'S MOTION TO FIND  
THE PERKINS GROUP IN CONTEMPT  
AND TO IMPOSE SANCTIONS**

1 Points and Authorities, Request for Judicial Notice (“RJN”), and Declaration of  
2 Pamela M. Egan (“Egan Decl.”), filed herewith.

3 **NOTICE**

4 **If you wish to object to the foregoing Motion, an objection must be**  
5 **filed and served upon undersigned counsel by January 3, 2023.** If no  
6 objection is received, then the Court may enter an Order without actual  
7 hearing or further notice unless a written objections is timely served and filed.

8 WHEREFORE, the Trustee requests an Order:

- 9 1. Finding that the Perkins Group is in contempt;
- 10 2. Sanctioning the Perkins Group by requiring Perkins Coie LLP,  
11 Lowell Ness, Brynes Keller Cromwell LLP, Ralph E. Cromwell, Jr., and Joffrey  
12 McWilliam, jointly and severally, to pay to the estate \$1,000 per day from the date  
13 they filed the Third-Party Complaint (December 7, 2022) to the date the Third-  
14 Party Complaint is dismissed with prejudice; and
- 15 3. Granting such other and further relief as the Court deems equitable  
16 and just.

17 Dated: December 13, 2022

POTOMAC LAW GROUP PLLC

18  
19 By: s/ Pamela M. Egan  
20 Pamela M. Egan (WSBA No. 54736)  
21 *Attorneys for Mark D. Waldron, Chapter*  
22 *7 Trustee*

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